

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Wayne Sampson Cooper Jr.,  
Stephanie Anne Cooper,

*Debtors.*

Case No. 24-14055-pmm  
Chapter 13

**Motion to Approve Loan Modification**

Debtors Wayne Sampson Cooper Jr. and Stephanie Anne Cooper, through their attorney, move this Court as follows:

1. The Debtors filed this case under chapter 13 on November 12, 2024. A plan has been proposed, but not yet confirmed.

2. The Debtors' chapter 13 plan was filed with the intent to reorganize their financial obligations and retain ownership of their real property located at 135 Glenwood Avenue in Collegeville, Pennsylvania ("the Property"), which is their primary residence.

3. The Property is encumbered by a mortgage lien held by AmeriHome Mortgage Company LLC.

4. To cure arrears and restructure the mortgage terms, the Debtors and Lender have negotiated and executed a Loan Modification Agreement (the "Agreement"). Exhibit A.

5. Under the Loan Modification Agreement, as of November 1, 2024, the balance of the mortgage loan is \$523,475.35, which includes principal, interest, and other capitalized amounts. The loan will accrue interest at a fixed annual rate of 3.375%. Starting December 1, 2024, the Debtors will make monthly payments of \$1,988.84 for principal and interest, due on the first day of each month. The loan will

mature on November 1, 2064, at which time any remaining balance will be due in full.

6. The Debtors request approval of the Loan Modification Agreement pursuant to 11 U.S.C. §§ 1322(b)(2) and 1329, as the Agreement modifies the terms of a secured claim on the Debtors' principal residence and is consistent with their proposed chapter 13 plan.

7. Approval of the Agreement will enable the Debtors to retain their home, cure any pre-petition arrears, and remain current on their mortgage obligation going forward.

8. The modification will not prejudice creditors,

9. Approval of the Loan Modification Agreement is in the best interest of the Debtors, the bankruptcy estate, and creditors, as it allows the Debtors to resolve the mortgage arrears, maintain payments going forward, and retain their primary residence.

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: December 18, 2024

SADEK LAW OFFICES, LLC  
*Attorney for Debtors*

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